UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF LOUISIANA

DANIEL GONZALES LLAGAS

VERSUS

SEALIFT HOLDINGS, INC.; SEALIFT, INC.; BLACK EAGLE SHIPPING, LLC; FORTUNE MARITIME, LLC; SEALIFT

TANKSHIPS, LLC; SAGAMORE SHIPPING, LLC; and REMINGTON

SHIPPING LLC

* CIVIL ACTION

* NO.: 2:17-CV-00472-PM-KK

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* JUDGE CAIN

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* MAGISTRATE JUDGE KAY

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MOTION TO RECOGNIZE AND ENFORCE ARBITRATION DECISION AND RELEASE SECURITY

Sealift Holdings, Inc., Sealift, Inc., Black Eagle Shipping, LLC, Fortune Maritime, LLC, Sealift Tankships, LLC, Sagamore Shipping, LLC, and Remington Shipping, LLC (collectively, "Sealift") respectfully move this Honorable Court for an Order recognizing and enforcing the decision of Labor Arbiter Associate Alfonso M. Molino ("Arbiter Molino") rendered in the Republic of the Philippines on January 4, 2022 in the matter styled *Daniel G. Llagas v. Magsaysay Maritime Corp., Sealift Holdings, Inc., and Marlon R. Roño*, NLRC NCR OFW Case No. (M) 05-0192-21, in which Arbiter Molino "**DISMISSED** for lack of basis and merit" all claims asserted by Plaintiff Daniel Gonzales Llagas ("Plaintiff"). On the basis of the Arbiter's Decision, and as further set forth in the attachment Memorandum in Support, Sealift is entitled to judgment in its favor and return of all remaining security held for Plaintiff's benefit.

Respectfully Submitted,

/s/ Alan R. Davis

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